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<p>1 Confidential - A. Qurei 2 step out, so, if you want to, note the 3 time. I'm not trying to -- 4 MR. STEINER: How long do you 5 anticipate the record will be? 6 MR. ROCHON: Two minutes, three 7 minutes. 8 (Thereupon, the witness, Mr. McAleer, 9 and the two interns leave the conference 10 room.) 11 MR. ROCHON: For the record, the 12 interns filed out with the witness, and 13 Mr. McAleer, to figure out what to do 14 about that. 15 The witness is correct that this is 16 completely irrelevant to this litigation. 17 We're talking about a case that happened 18 in 2002. You've got theories about the 19 funding of Al-Aqsa. You've got theories 20 about Fatah. 21 Obviously you've got some -- so yes, 22 I do want to have a proffer from you as to 23 where this is going. I think the witness 24 is absolutely correct in his reaction, and 25 I'm not surprised at it.</p>	<p>1 Confidential - A. Qurei 2 with brother counsel and on other cases. 3 We are not here to gather discovery for 4 other cases. We're here to gather 5 discovery for the Saperstein case. 6 I will ask that the questions at 7 least have some tangible relevance to the 8 Saperstein case. 9 (Thereupon, an informal discussion was 10 held off the record.) 11 MR. ROCHON: If you want, I can have 12 Mr. McAleer bring the witness back. 13 MR. STEINER: No. I will respond to 14 your argument briefly. 15 It's our position that the PLO, 16 obviously, is the defendant in this 17 action, and their assets, their funding, 18 and their possible links to the other 19 organizations which are named and have 20 come up during the course of this dispute, 21 and the function of those organizations is 22 all ripe, pertinent, and relevant to the 23 subject matter at hand. That's our 24 response. 25 MR. ROCHON: The board of directors</p>
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<p>1 Confidential - A. Qurei 2 You're talking about an organization 3 in 1995, Samed. This may be of interest 4 to plaintiffs in other cases, but it is 5 irrelevant to the Saperstein case. 6 MR. STEINER: I'm not sure I'm 7 required to give you a proffer. 8 While your position is certainly one 9 to which you're entitled, and the witness 10 is certainly entitled to his position, you 11 are still required, as you know, to 12 respond to the questions. 13 The arguments regarding relevance may 14 become ripe at a future date, and his 15 reluctance and refusal to answer at this 16 time is inappropriate and in violation of 17 the rules governing this deposition. 18 MR. ROCHON: So far he hasn't refused 19 to answer any questions. I will say I am 20 well aware of counsel handling other 21 matters with the fascination of Samed of 22 some of the plaintiff's counsel in other 23 cases, but it is irrelevant to this case. 24 This is not a case about overall 25 assets. I've been through this litigation</p>	<p>1 Confidential - A. Qurei 2 of Samed in 1995, and who was chosen and 3 how, has nothing to do with where the 4 money went. If you're asking him about 5 where the money is, what the money was 6 for, what happened to the funding, get to 7 it. 8 I didn't object to funding questions, 9 and I won't. That's what you've said was 10 part of your theory, but this has nothing 11 to do with your theory. 12 Now, we can agree to disagree 13 gentlemanly, as we have. I will have the 14 witness come in. I'm not directing him 15 not to answer, but -- 16 MR. STEINER: I will state I'm not 17 consenting it's necessary at this time 18 that I do have and have seen information 19 which clearly states that large amounts of 20 funds that were intended for the PLO and 21 for the PA and for Fatah were actually 22 deposited in accounts which were named to 23 personal individuals, including this 24 individual (indicating), who is the 25 witness before us today.</p>

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<p>1 Confidential - A. Qurei 2 MR. ROCHON: If you want to ask him 3 about that, ask him. 4 MR. STEINER: I will get to that, but 5 I think I have enough of a good-cause 6 reason to delve into the other board 7 members who also might have had accounts 8 in their own names, knowing that this 9 individual had his, which handled assets 10 that were intended for the PLO and the PA.</p> <p>11 MR. ROCHON: The curiosity of 12 plaintiff's counsel with PLO funding is 13 interesting, and I'm sure fascinating, but 14 not related to Mr. Saperstein, and none of 15 these questions go to that, and there's no 16 connection to Mr. Saperstein.</p> <p>17 MR. STEINER: Okay.</p> <p>18 MR. ROCHON: Now we're agreeing to 19 disagree, so we can have the witness come 20 in.</p> <p>21 (Thereupon, an informal discussion was 22 held off the record.)</p> <p>23 MR. ROCHON: The court reporter has 24 asked for a restroom break. Let's go off.</p> <p>25 MR. STEINER: Can we go off for five</p>	<p>1 Confidential - A. Qurei 2 in an attempt to evade the question while indeed you 3 did know? 4 A. Before you continue, I do not evade. I 5 do not -- I'm -- I'm not evasive. 6 Q. Okay. 7 A. I am speaking straightforward and very 8 accurate and correct manner -- 9 Q. Okay. 10 A. -- and I respect the mission on which you 11 are -- which you are doing now, but also you are 12 supposed to respect my situation and the Authority. 13 Q. Sir, while you were being as what you 14 described as non-evasive and answering the 15 questions, you responded that you don't know who 16 these individuals are (indicating), right? 17 (Thereupon, the interpreter then 18 begins to translate the record into Arabic 19 for the witness.) 20 MR. ROCHON: Objection. 21 (Thereupon, the interpreter continues 22 to translate the record into Arabic to the 23 witness.) 24 MR. ROCHON: Objection, 25 mischaracterizes the testimony.</p>
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<p>1 Confidential - A. Qurei 2 minutes? 3 THE VIDEOGRAPHER: Off the record. 4 The time is 12:15. 5 (Recess taken at 12:15 p.m.) 6 (Resumed at 12:29 p.m.) 7 THE VIDEOGRAPHER: Back on the 8 record. The time is 12:29. This begins 9 Tape No. 3 in the deposition of Ahmed 10 Qurei.</p> <p>11 BY MR. STEINER: 12 Q. Sir, we've had approximately a ten-minute 13 break, during which time you were out of the room 14 together with your attorneys. 15 And I'm wondering upon your return if any of 16 your responses regarding who these individuals named 17 in Exhibit 1 are and what positions they hold now or 18 have ever held in the PLO and/or Palestinian 19 Authority are.</p> <p>20 A. First of all, I consider this a private 21 Palestinian matter. This is a private matter of the 22 Palestinian National Authority, and I don't believe 23 that this is the place to -- to engage in discussion 24 of that nature.</p> <p>25 Q. So, sir, did you respond "I don't know"</p>	<p>1 Confidential - A. Qurei 2 MR. STEINER: He said he's not 3 evasive and he was answering the 4 questions. 5 MR. ROCHON: You said that he 6 testified he didn't know who these people 7 are. 8 MR. STEINER: He said he didn't 9 know -- 10 MR. ROCHON: He testified he didn't 11 know what position they held. 12 MR. STEINER: -- and -- but the 13 record will speak to that. 14 BY MR. STEINER: 15 Q. You testified you don't know what 16 positions these individuals (indicating) have held, 17 right? 18 That's what you said, isn't it? 19 A. (No response). 20 Q. Sir, I need you to respond yes or no, or 21 any other response you would like to give. 22 A. I don't know. 23 Q. The last name on the document before you 24 is Hassan Ibrahim Hassan Abu Lebdeh, isn't it? 25 A. Yes.</p>

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<p>1 Confidential - A. Qurei 2 Q. And while you were prime minister, he was 3 your director general, wasn't he? 4 A. If you know that, why are you asking? 5 Q. Was he your director general while you 6 were prime minister, sir? 7 A. Please, ask me about myself. Don't ask 8 me about others. 9 Q. Sir, you responded that you are not 10 evasive and that you are answering the questions, 11 and earlier, when I asked you what positions these 12 people held, you told me you do not know -- 13 MR. ROCHON: Excuse me, Counsel. 14 He's giving an answer. 15 MR. STEINER: I'm not finished with 16 my question. 17 MR. ROCHON: You had. 18 At least give the interpreter a 19 chance to translate it. 20 MR. STEINER: Well, I will ask the 21 question. 22 (Thereupon, the interpreter then 23 continues to translate the record into 24 Arabic for the witness.) 25 THE WITNESS: Yes, I have been</p>	<p>1 Confidential - A. Qurei 2 held off the record.) 3 THE REPORTER: Thank you. 4 BY MR. STEINER: 5 Q. Do you know who that individual is, sir? 6 A. I don't want to answer any of these 7 (indicating). 8 Q. Okay, so is your answer that -- 9 Having stated your reluctance to answer these 10 questions, are you indeed aware of who these 11 individuals are and what positions they held? 12 A. I'm not answering. 13 Q. And are you not answering because you are 14 trying to protect these individuals? 15 A. Why -- from what should I put -- why 16 would I protect them? For what? From what am I 17 protecting them? 18 What is the case? What are you asking about? 19 What is the subject matter here? I don't -- I don't 20 understand. 21 Q. The question, sir, is I want you to 22 explain -- 23 A. I don't believe -- 24 (Thereupon, an informal discussion was 25 held off the record.)</p>
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<p>1 Confidential - A. Qurei 2 answering, and still answering the 3 questions. 4 BY MR. STEINER: 5 Q. One of your answers is you don't know 6 what positions these individuals held, right? 7 A. (No response). 8 Q. That was your answer? "I don't know"? 9 A. Hmm. 10 Q. Well, didn't you know Mr. Hassan Ibrahim 11 Hassan Abu Lebdeh was your director general? 12 A. I am an old man, and I started to forget. 13 Q. Very well, sir. 14 Are you now reminded that indeed he was your 15 director general? 16 A. Yes. 17 Q. And are you now able to tell me, if I can 18 have the interpreter re-read to me the second name 19 which appears under the witness's name? 20 THE INTERPRETER: The second name on 21 the list? 22 MR. STEINER: Yes. 23 THE INTERPRETER: Okay. Engineer 24 Fadel Saed Mohammed Kaawash. 25 (Thereupon, an informal discussion was</p>	<p>1 Confidential - A. Qurei 2 THE WITNESS: I am objecting again to 3 the word "protect," because they are not 4 accused. 5 BY MR. STEINER: 6 Q. Well, is it a fear that they may be 7 accused of something? 8 A. This is our business (indicating). This 9 is Palestinian affair. If they become accused, we 10 will take necessary steps. 11 Q. Sir, I'm a lawyer from New York, and I'm 12 representing a Mr. Moshe Saperstein, who was a 13 victim of a terrorist attack that occurred in the 14 Gaza Strip in 2002. 15 I'm here under the authority of the federal 16 courts of the United States of America to ask you 17 questions, and I would appreciate it if you could 18 please answer my questions. 19 A. That's why you should ask about -- you 20 should stick to the subject. This is irrelevant to 21 the subject. 22 Q. I will decide what questions I'm going to 23 ask and what questions I believe are relevant. 24 A. And I'm going to decide what questions to 25 answer.</p>

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1	Confidential - A. Qurei	1	Confidential - A. Qurei
2	Q. If you don't answer --	2	However, I request that he not be
3	If you decide not to answer a question, I would	3	evasive and that he be forthright and that
4	ask that you state that, that "I refuse to answer,"	4	he answer questions, and what had actually
5	and not mislead people by stating you don't know.	5	transpired is he repeatedly stated that he
6	MR. ROCHON: Objection.	6	does not know the individuals on this
7	(Thereupon, the interpreter then	7	document (indicating).
8	begins to translate the record into Arabic	8	After stating such, he was confronted
9	for the witness.)	9	with the fact that one of the individuals
10	MR. ROCHON: Objection.	10	was indeed his director general, and he
11	THE WITNESS: I will say what I want.	11	blamed his failure to know that on his
12	I will say what I want. No one tells me	12	age.
13	what to say.	13	THE WITNESS: What does it help you
14	MR. ROCHON: Objection. I suggest we	14	in this?
15	take a break. I will try to instruct the	15	MR. ROCHON: The name --
16	witness.	16	THE WITNESS: What help does this
17	Your colleagues, I can hear, are	17	give you?
18	making noises and are upset about this.	18	What is the issue here? What case
19	If they could keep that noise to	19	are we here for, just so I know?
20	themselves --	20	MR. STEINER: Sir, we are here, as I
21	MR. STEINER: Let's take a break.	21	stated, because I am a lawyer --
22	Note the time.	22	(Thereupon, an informal discussion was
23	THE VIDEOGRAPHER: The time is 12:36.	23	held off the record.)
24	Off the record.	24	MR. STEINER: To respond to the
25	(Thereupon, an informal discussion was	25	witness, I am a lawyer from New York, and
1	Confidential - A. Qurei	1	Confidential - A. Qurei
2	held off the record.)	2	I'm prosecuting an action in which a Jew
3	(Recess taken at 12:36 p.m.)	3	was killed by terrorists in the Gaza
4	(Resumed at 12:55 p.m.)	4	Strip.
5	THE VIDEOGRAPHER: Back on the	5	The defendants on that action are the
6	record.	6	PLO and the Palestinian Authority. I'm
7	The time is 12:55.	7	sorry. A Jew was shot by terrorists, and
8	MR. ROCHON: Okay. Thank you.	8	another Jew was killed, and I'm
9	For the record, I have consulted with	9	prosecuting an action on behalf of the
10	Mr. Qurei, and before he answers any	10	Jew, Moshe Saperstein, who was shot.
11	further questions that --	11	Under the authority of the federal
12	The tone of the exchange before he	12	courts of the United States of America, my
13	left had gotten unpleasant, and in my	13	intention, sir, is in the most respectful
14	view, I understand that you don't like	14	way possible to ask you questions.
15	that Mr. Qurei has not answered the	15	MR. ROCHON: Mr. Steiner, you put
16	questions the way you wish, but it's	16	that in a political way.
17	disrespectful to Mr. Qurei, and I've asked	17	THE WITNESS: I do not see that
18	counsel to not to be disrespectful to	18	respect.
19	Mr. Qurei, even if you don't agree with	19	MR. ROCHON: Yes, and I -- and I
20	his answers.	20	agree with the witness. You've put that
21	MR. STEINER: It was not my intention	21	in a political way, referencing terror and
22	to be disrespectful to Mr. Qurei. I'm	22	the -- and the religion of the victims,
23	just seeking to elicit answers and do my	23	which is not pertinent to the claims.
24	utmost to treat -- do my utmost best to	24	It's not part of the claims.
25	treat him with respect.	25	It's done to possibly try to

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<p>1 Confidential - A. Qurei 2 antagonize or inflame the witness, and if 3 you wish to get answers, I suggest you 4 just try to ask the questions you have, 5 and we will move forward. 6 If the witness doesn't answer a 7 question to your satisfaction and you want 8 to document that, feel free to do so, but 9 don't try to antagonize him.</p> <p>10 BY MR. STEINER:</p> <p>11 Q. Sir, did any of the individuals who are 12 listed in Exhibit 1 ask you not to discuss what 13 their status was in the Palestinian Authority or the 14 PLO?</p> <p>15 A. No, but because of my responsibility and 16 my position, I do not discuss people with any in the 17 world, with any lawyer in the world.</p> <p>18 If there is a specific case, I will answer 19 questions in all honesty about that particular case.</p> <p>20 Q. What was Marwan Barghouti?</p> <p>21 A. And this is not a secret. This is no 22 secret. This is National Authority.</p> <p>23 MR. ROCHON: For the record, when he 24 said "this," he was handling the 25 Plaintiff's Exhibit 1.</p>	<p>1 Confidential - A. Qurei 2 produced -- should have been produced by 3 the defendants in response to a 4 plaintiff's request, and I asked you for 5 what those requests were. 6 I understand this to be a document 7 also related to Samed, and I would note 8 that of the well over a hundred total 9 number of interrogatories and document 10 requests that have been propounded to us 11 by the plaintiffs in this case, not one of 12 them has been in reference to Samed. 13 There is certainly nothing that has 14 been requested of us in that regard, so 15 this is not a failure of production by us. 16 We also, therefore, because it hasn't been 17 produced to us, question the authenticity 18 of this document, which is in Arabic, 19 which I don't read, or the date of this 20 document, which I understand is not on it, 21 according to the brief look at it from our 22 translator. 23 Counsel, you have an obligation under 24 the discovery rules to provide documents 25 for a host of reasons, not just document</p>
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<p>1 Confidential - A. Qurei 2 MR. STEINER: Thank you. 3 I would like to have this marked 4 Exhibit 2, please (indicating). 5 (Thereupon, a document was marked by 6 the reporter as Plaintiff's Qurei Exhibit 2 7 for identification.) 8 THE WITNESS: Yes.</p> <p>9 BY MR. STEINER:</p> <p>10 Q. Sir, the column with the caption on the 11 top states "Shareholders," doesn't it?</p> <p>12 A. Yes.</p> <p>13 Q. And that's a document -- Exhibit 2 -- 14 which depicts the shareholders that are presently 15 the shareholders in the corporation that we've been 16 discussing? 17 The new Samed, correct?</p> <p>18 A. Yes.</p> <p>19 MR. ROCHON: All right. 20 Just note the objection that this 21 also is a document that was not produced 22 that would have been subject to document 23 requests. 24 You had previously suggested that 25 our -- that Exhibit 1 should not have been</p>	<p>1 Confidential - A. Qurei 2 requests, but there are affirmative 3 obligations under the federal rules. 4 If this deposition is going to become 5 a series of documents by surprise, let us 6 know, but that's not an appropriate way to 7 proceed, and there's nothing wrong with us 8 having had the opportunity to prepare a 9 witness with documents that are in the 10 case. 11 So the idea of doing discovery by 12 surprise in the deposition of a 13 74-year-old gentleman is just 14 completely -- dealing with documents, some 15 of them that go back 15 years, is 16 improper, and it's unfair to the witness. 17 MR. STEINER: It is -- this is -- 18 MR. ROCHON: Now, are you going to 19 make proffer as to the date, the 20 provenance, or the authenticity of this 21 document? 22 MR. STEINER: This is a document that 23 we've just become in receipt of, that 24 we've just received. 25 MR. ROCHON: I don't know if you</p>

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<p>1 Confidential - A. Qurei 2 picked it up on the sidewalk, or if you 3 have a representation as to the provenance 4 of the document.</p> <p>5 MR. STEINER: Well, the witness just 6 described what the document was.</p> <p>7 MR. ROCHON: The witness didn't 8 describe the date or the authenticity of 9 the document.</p> <p>10 MR. STEINER: We will get to that. 11 We will get to that.</p> <p>12 MR. ROCHON: I'm sorry? You said you 13 will get to that?</p> <p>14 MR. STEINER: Yeah.</p> <p>15 MR. ROCHON: Okay.</p> <p>16 Are you making a proffer to me as 17 brother counsel as to a document you are 18 producing for the first time today, as to 19 the provenance of this document?</p> <p>20 MR. STEINER: I've given you the 21 document.</p> <p>22 If you want to take a few minutes and 23 go over it with your translator, that's 24 fine. Would you like to do that?</p> <p>25 MR. ROCHON: I've asked you about the</p>	<p>1 Confidential - A. Qurei 2 begins to translate the record into Arabic 3 for the witness.)</p> <p>4 THE WITNESS: They are not current 5 shareholders, because it's over. It's 6 dissolved.</p> <p>7 BY MR. STEINER:</p> <p>8 Q. Okay. When was it dissolved?</p> <p>9 A. About two years ago. About two years 10 ago.</p> <p>11 Q. Why was it dissolved?</p> <p>12 A. That's what we decided.</p> <p>13 Is it concern to you why? Do I ask you about 14 any Israeli institutions, why they were dissolved? 15 Or American institutions? It was decided that it be 16 dissolved.</p> <p>17 Q. Did the corporation exist between October 18 2000 and February 2002?</p> <p>19 A. Yes.</p> <p>20 Q. And while it existed between those dates, 21 were these the shareholders (indicating), those 22 depicted on Exhibit 2?</p> <p>23 A. I believe so, but I am not completely 24 sure.</p> <p>25 MR. STEINER: Okay.</p>
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<p>1 Confidential - A. Qurei 2 provenance. My translator can't help me 3 as to the authenticity or the date of the 4 document, which doesn't appear on it, nor 5 on its face, unlike the first document, 6 which is purported to have a seal.</p> <p>7 MR. STEINER: I will continue with my 8 questions.</p> <p>9 BY MR. STEINER:</p> <p>10 Q. Sir, you've already agreed that this is 11 an updated list of the current shareholders of 12 Samed, correct?</p> <p>13 A. Not updated? Not updated? Since when? 14 This is from the '90s, as far as I believe.</p> <p>15 Q. Why do you say that?</p> <p>16 A. Because after that, nothing happened. I 17 don't remember.</p> <p>18 MR. STEINER: Can you read back three 19 or four questions ago when I asked the 20 witness if this is an updated list, and he 21 said "yes"?</p> <p>22 (Whereupon, the requested portion of 23 the record was read back by the court 24 reporter.)</p> <p>25 (Thereupon, the interpreter then</p>	<p>1 Confidential - A. Qurei 2 I would ask the interpreter to recite 3 the name of the first individual on the 4 document to the witness.</p> <p>5 THE INTERPRETER: Abdul Aziz (last 6 name unintelligible).</p> <p>7 BY MR. STEINER:</p> <p>8 Q. Are you familiar with that gentleman, 9 sir?</p> <p>10 A. Are we back to the same questions? Are 11 we back to the same questions?</p> <p>12 Q. Are you refusing to answer whether or not 13 you are familiar with that gentleman, sir?</p> <p>14 A. I have not refused. I have neither 15 refused nor accepted.</p> <p>16 Q. Then --</p> <p>17 A. I would like to get the point. What do 18 you want? I am not accused of anything before you. 19 Not at all.</p> <p>20 I am here to be questioned regarding a 21 particular case as a Palestinian official, and I've 22 been answering.</p> <p>23 Q. Will you tell me who these individuals 24 are and what positions they held in the PLO or the 25 Palestinian Authority between October 2000 and</p>

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<p>1 Confidential - A. Qurei 2 February of 2002? 3 A. I can hardly remember what happened last 4 year. Many events have been happening, much more 5 important than this (indicating). 6 (Thereupon, an informal discussion was 7 held off the record.) 8 BY MR. STEINER: 9 Q. What happened to the assets of the new 10 Samed that we're discussing, after it was dissolved 11 at the time you say it was dissolved? 12 A. It was liquidated, and it went to 13 sources. 14 Q. Can you tell me please what those sources 15 were? 16 A. Sources. 17 Q. Such as? 18 A. The entities that had founded it. 19 Q. What entities are those? 20 A. Where do you -- what are you trying to 21 get? Why are you interfering with the 22 Palestinian -- with the Palestinian affairs? 23 Q. I've tried my best to explain to you why, 24 and I don't think I need to repeat it. 25 A. No. You have been explaining things to</p>	<p>1 Confidential - A. Qurei 2 answered, and again, I will pose the question, 3 and -- and -- 4 Again, I will pose the question. Who are the 5 sources -- 6 A. Do not pose the question. 7 Q. Who are the sources that received the 8 assets? 9 A. Let's get to the point. Let's cut to the 10 chase. 11 Q. The point now is for me to determine 12 where the money went. 13 A. None of your business. 14 (Speaking in English) It's not your business. 15 Q. Are you refusing to answer? 16 A. It's not your business. 17 (Speaking in English) Can I ask where your 18 money -- 19 Q. If you were -- 20 (Thereupon, an informal discussion was 21 held off the record.) 22 BY MR. STEINER: 23 Q. If you were an attorney deposing me, you 24 could ask. 25 A. I wouldn't be asking you these questions,</p>
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<p>1 Confidential - A. Qurei 2 me that are irrelevant to the matter. 3 It was liquidated by an official decision. 4 Whoever made the decision was in charge of it. 5 Q. Sir, what sources did the funds go to 6 upon the liquidation of this corporation 7 (indicating)? 8 A. The sources -- the sources were the 9 entities that had founded it. 10 Q. And who are they? 11 A. It's not -- it's not your right. 12 MR. ROCHON: Objection. There's 13 already been testimony about that. 14 THE WITNESS: This mission is not 15 your right. 16 BY MR. STEINER: 17 Q. Are you then refusing to respond? 18 A. No. 19 I'm asking that you be employed by us so that 20 you can ask such a question. 21 Q. I've explained to you the authority under 22 which I'm asking you those questions, sir. 23 A. And I explained to you what authority I 24 am answering under. 25 Q. The problem is, sir, you have not</p>	<p>1 Confidential - A. Qurei 2 because I respect people. 3 Q. Over the course of the existence of the 4 new Samed corporation, who, if anybody, did it pay 5 dividends to? 6 A. What do you mean by "new"? Was there a 7 new one and an old one? That's how the Israelis 8 classified it. 9 Q. By "new" Samed corporation, sir, I mean 10 the one that's depicted in the certificate of 11 incorporation in Exhibit 1 (indicating), not the one 12 which existed in Lebanon. 13 A. So this is a new term I am just learning 14 from you. 15 (Several speakers talk over each other 16 at the same time.) 17 BY MR. STEINER: 18 Q. That's why -- I just thought of this term 19 now. I apologize if it's -- 20 A. (Speaking in English) The new and old, 21 because we don't know it. You are more 22 sophisticated than us. 23 Q. Well, I appreciate your humor and 24 sarcasm, sir. 25 (Several speakers talk over each other</p>

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1 Confidential - A. Qurei 2 at the same time.) 3 BY MR. STEINER: 4 Q. And perhaps the proceedings need some 5 levity, although I do take the subject of my 6 client's matter seriously. 7 A. I'm not sarcastic. These are new names. 8 Q. Sir, I take the injury of my clients 9 quite seriously, and I take the damages and pain and 10 suffering that he endured seriously. 11 A. I take my suffering seriously, too. 12 (Speaking in English) More than his suffering. 13 Until I arrived here, I suffered. 14 Q. Well, sir, I'm here representing -- 15 A. (Speaking in English) If you would -- if 16 you would -- if you would put it in a fair way. 17 Q. I am here representing him. I am here 18 representing Mr. Moshe Saperstein. 19 A. Okay. 20 Q. I'm sure you appreciate that. 21 A. Okay. All respect. 22 Q. Thank you. 23 Where did the dividends from the corporation 24 which is depicted in Plaintiff's Exhibit 1 go 25 (indicating) over the course of the corporation's	1 Confidential - A. Qurei 2 Q. I am trying to find out -- 3 A. You, as an Attorney General, did you come 4 for this matter? 5 Q. I came to find out at this stage in the 6 proceedings where the money went. I am trying to 7 find out where the money went. 8 A. What business is yours? What business 9 yours is where the money is (sic)? 10 (Several speakers talk over each other 11 at the same time.) BY MR. STEINER: 13 Q. Are you refusing to answer the question 14 about where the money went? 15 A. It's none of your business. Q. Sir, I have one final question -- (Thereupon, the witness begins speaking to the interpreter in Arabic.) THE INTERPRETER: The witness just asked the interpreter about the gentleman sitting to the right of Mr. Steiner (indicating). MR. STEINER: This is an attorney, Israeli counsel to -- to the plaintiff. THE WITNESS: You are welcome.
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1 Confidential - A. Qurei 2 existence? 3 MR. ROCHON: Objection, assumes a 4 fact not in evidence. 5 BY MR. STEINER: 6 Q. Were there dividends from the 7 corporation? 8 A. I'm not answering. I'm not answering. 9 This question has nothing to do with the subject 10 matter. 11 (Thereupon, an informal discussion was 12 held off the record.) 13 THE WITNESS: What are these 14 questions? 15 BY MR. STEINER: 16 Q. Sir, this was an organization in which 17 you were the first member listed on the shareholder 18 certificate when it was established, right? 19 A. Are we back? 20 Q. And indeed you were listed -- 21 A. Please, please. 22 Q. You are listed as the head of the board 23 of directors? A. Please, excuse me. Is this the subject matter?	1 Confidential - A. Qurei 2 MR. STEINER: I am an attorney from 3 New York who is representing him, and he's 4 local counsel. He's counsel from Israel. 5 THE WITNESS: I am not a lawyer from 6 Palestine. I am under the Israeli 7 occupation. BY MR. STEINER: 9 Q. Okay, which may indeed be the last 10 question on this subject, sir. The corporation that you say was liquidated two years ago -- is that the corporation which is depicted in Plaintiff's Exhibit 1 (indicating)? A. This is the same. The same -- Q. Okay. A. -- institution. Q. So this corporation no longer exists? That's your testimony? A. Finito. (Thereupon, an informal discussion was held off the record.) BY MR. STEINER: Q. Sir, it's fair to say that the social and economic programs that you engage in for the betterment of the Palestinian people requires money,
	29 (Pages 110 to 113)

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<p>1 Confidential - A. Qurei 2 begins to translate the record into Arabic 3 for the witness.) 4 MR. ROCHON: Just one minute. 5 Objection, calls for speculation. 6 THE WITNESS: He -- if he received a 7 salary from the Legislative Council, he 8 wouldn't receive a salary from the 9 movement. 10 If he received a salary from the PA, 11 that -- then it doesn't get paid by the 12 movement.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. Did he have an office by virtue of his 15 position with Fatah between October 2000 and 16 February 2002?</p> <p>17 A. There was the Office of Organization and 18 Mobilization.</p> <p>19 Q. And that -- was that a Fatah office?</p> <p>20 A. The Mobilization and Organization, of 21 course.</p> <p>22 Q. And did Mr. Marwan Barghouti have staff 23 within that office such as assistants, secretaries?</p> <p>24 A. I really wouldn't know.</p> <p>25 Q. And --</p>	<p>1 Confidential - A. Qurei 2 (Thereupon, the interpreter begins to 3 translate the question into Arabic for the 4 witness.) 5 MR. ROCHON: Objection. There is -- 6 This is so far afield from this case. 7 This is so far afield, I mean, this is 8 curiosity for some other case. 9 MR. STEINER: Are you directing the 10 witness not to answer? 11 THE WITNESS: I am with Green 12 September.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. Who are they?</p> <p>15 A. Black September? Oh, you mean Green? I 16 am joking. I'm sorry.</p> <p>17 Q. Are you familiar with that organization, 18 sir? Black September?</p> <p>19 A. It is not an organization. It's 20 something that came up after September events in 21 Jordan. It doesn't physically exist. There's not 22 physically something called "organization" in that 23 name.</p> <p>24 (Thereupon, an informal discussion was 25 held off the record.)</p>
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<p>1 Confidential - A. Qurei 2 (Thereupon, an informal discussion was 3 held off the record.)</p> <p>4 BY MR. STEINER:</p> <p>5 Q. The office that you described -- who paid 6 the rent for that?</p> <p>7 A. Which office?</p> <p>8 Q. The one where you stated previously 9 Mr. Marwan Barghouti conducted his work. 10 (Thereupon, the interpreter then 11 begins to translate the record into Arabic 12 for the witness.)</p> <p>13 MR. ROCHON: Objection.</p> <p>14 BY MR. STEINER:</p> <p>15 Q. I don't remember the name of it.</p> <p>16 A. There was no office named Marwan 17 Barghouti's office. There is the mobilization and 18 organizing office.</p> <p>19 Q. Thank you. Who paid for that office?</p> <p>20 A. The movement.</p> <p>21 Q. You mean PA, PLO, Fatah?</p> <p>22 A. Fatah.</p> <p>23 Q. Okay.</p> <p>24 Now, sir, are you familiar with an organization 25 called Black September?</p>	<p>1 Confidential - A. Qurei</p> <p>2 BY MR. STEINER:</p> <p>3 Q. If it's not an organization, sir, who -- 4 what did it consist of?</p> <p>5 A. I don't know.</p> <p>6 Q. Who was in it?</p> <p>7 A. I don't know.</p> <p>8 Q. Did the PLO fund Black September 9 activities?</p> <p>10 A. I don't know, but I don't believe so.</p> <p>11 Q. Did the PLO give instructions to Black 12 September?</p> <p>13 A. (Begins speaking in Arabic). 14 (Thereupon, the interpreter then 15 begins to confer with the witness in 16 Arabic.)</p> <p>17 THE INTERPRETER: "I really don't 18 know, but I don't believe so."</p> <p>19 BY MR. STEINER:</p> <p>20 Q. Did Black September advance the goals of 21 the PLO?</p> <p>22 (Thereupon, the interpreter then 23 begins to translate the record into Arabic 24 for the witness.)</p> <p>25 MR. ROCHON: I am going to object.</p>

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1 Confidential - A. Qurei 2 Given the witness's previous 3 description of Black September, I think 4 the question is based on a fact not in 5 evidence.	1 Confidential - A. Qurei 2 Q. Palestinian who? 3 THE INTERPRETER: "Leaderships." 4 Leaders, leaderships. 5 BY MR. STEINER: 6 Q. Aren't there streets in areas that are 7 controlled by the Palestinian Authority which are 8 named in memory of individuals that launched attacks 9 against Israel?
6 BY MR. STEINER: 7 Q. You can answer, sir. 8 A. What was the question? 9 Q. Did Black September advance the goals of 10 the PLO? 11 A. The goals of the PLO are very clear. 12 Black September -- 13 I do not know that it is an organization. It 14 was a phenomenon that existed for a certain period 15 of time, and it's gone.	10 A. It's possible. I don't know. I'm not 11 sure, but it's possible. Not because they committed 12 that, but because they are freedom fighters. 13 Q. Isn't there a museum within the areas 14 controlled by the Palestinian Authority which 15 displays figures of Arabs that launched attacks against Israel who are now martyred?
16 Q. Are you familiar with an individual named 17 Abu Daoud? 18 A. Abu Daoud? 19 Q. Yes. 20 A. If I know him personally? 21 Q. Are you aware of -- are you familiar with 22 him? 23 A. He was with me at the classroom, at 24 school. 25 (Speaking in English) At school, but I was	16 (Thereupon, the interpreter then begins to translate the record into Arabic for the witness.) 17 MR. ROCHON: Objection. Please finish that. 18 (Thereupon, the interpreter continues to translate the record into Arabic to the witness.) 19 MR. ROCHON: So -- objection. We
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1 Confidential - A. Qurei 2 never connected to him directly in any work. 3 Q. Where was that, sir? Which school did 4 you attend with him? 5 A. In Jerusalem. Rashidiyyah Omariyyah. 6 (Thereupon, an informal discussion was 7 held off the record.) 8 BY MR. STEINER: 9 Q. Sir, is there a formal body in the 10 Palestinian Authority that's responsible for the 11 naming of public streets and public squares? 12 THE INTERPRETER: "Formal body"? 13 BY MR. STEINER: 14 Q. Is there a formal body in the Palestinian 15 Authority that's responsible for the naming of 16 public streets and public buildings? 17 A. The concerned ministries. 18 Q. And sir, aren't streets and buildings 19 named after -- 20 Weren't streets and buildings within areas 21 controlled by the Palestinian Authority named after 22 individuals that launched attacks against the state 23 of Israel with suicide bombers? 24 A. My knowledge is that it's names of 25 Palestinian leaderships.	1 Confidential - A. Qurei 2 have a time frame for this case. 3 To the degree this kind of stuff 4 would be relevant, it would have to be a 5 time frame that possibly could have 6 prompted this act. You didn't give a time 7 frame for your question. 8 MR. STEINER: I'm not sure I agree 9 with you. It certainly goes to state of 10 mind. 11 MR. ROCHON: State of mind in 2010 is 12 not causation for 2002. You guys made 13 proffer to have this man come, made a lot 14 of long arguments, now you are asking him 15 about street naming? 16 MR. STEINER: Yeah. 17 MR. ROCHON: This is -- you know, you 18 made representations to the Court to get 19 him here. You've covered the areas that 20 prompted him having to come here. 21 MR. STEINER: Uh-huh. 22 MR. ROCHON: And now you're just 23 engaging in some kind of random questions 24 on some other agenda that can't be this 25 case.

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<p>1 Confidential - A. Qurei 2 Q. It's on Exhibit 4, for the record. 3 A. Do you want me to discuss this matter? 4 Q. No. 5 (Thereupon, an informal discussion was 6 held off the record.) 7 MR. ROCHON: Do you guys want to go 8 outside? 9 MR. STEINER: No. I will just move 10 to strike the witness's question and the 11 response. It's a deposition where I pose 12 the questions.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. Okay. Sir, you mentioned earlier that 15 you are the head of the Jerusalem department of the 16 PLO, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And do you meet with foreign officials as 19 part of your duties as head of that department?</p> <p>20 A. I have always been meeting with foreign 21 persons.</p> <p>22 Q. And that's also true in your capacity as 23 head of the Jerusalem department of the PLO, in that 24 capacity you also met with the foreign officials?</p> <p>25 A. Yes.</p>	<p>1 Confidential - A. Qurei 2 these foreign officials? 3 MR. ROCHON: Objection. 4 The witness is not going to answer 5 questions about the diplomatic relations 6 of the PLO. Move on, please.</p> <p>7 BY MR. STEINER:</p> <p>8 Q. Well, have you spoken out against the 9 Judaization of Israel?</p> <p>10 A. Yes.</p> <p>11 Q. And what do you mean by "the Judaization 12 of Jerusalem"?</p> <p>13 A. I mean this -- this is a sacred city, and 14 I meant Judaization and Israelization. 15 Israelization is to empty the city from its -- its 16 Palestinian population through measurements and 17 practices that are very strange and tough, and this 18 includes demolishing of homes -- of their homes. 19 It includes the issuance of IDs and permits and 20 the right to -- to stay or reside in their city, and 21 this involves the checkpoints that have completely 22 closed the city. Now the city is almost closed by 23 military checkpoints. No one can enter without a 24 permit. This is regarding the population. That is 25 why it is a matter of making things difficult in</p>
<p>1 Confidential - A. Qurei 2 Q. And who are the foreign officials that 3 you have met in this capacity?</p> <p>4 A. You mean when? At that time? At that 5 date? On that date?</p> <p>6 Q. I am talking specifically about the time 7 you were appointed head of the Jerusalem department 8 of the PLO until today.</p> <p>9 A. I met with all the representatives that 10 we have, and I met with foreign -- with the foreign 11 ministers, visiting foreign ministers --</p> <p>12 Q. Can you just very briefly describe for 13 me --</p> <p>14 A. -- and I met with some Israelis.</p> <p>15 Q. Okay, and can you briefly describe for me 16 who some of the foreign officials are that you've 17 met with in this capacity?</p> <p>18 A. I'm not supposed to submit a report about 19 whom I met with.</p> <p>20 Q. Well, are you required to get their 21 permission each time you meet with foreign officials 22 from the PLO? And from the PLO, I mean from the 23 Executive Committee?</p> <p>24 A. No. That's my work.</p> <p>25 Q. What type of things do you discuss with</p>	<p>1 Confidential - A. Qurei 2 addition to confiscation of lands and construction 3 of settlements. 4 As for Judaization, it means close the city and 5 try to isolate it from its population and building 6 those new -- those Israeli cities around it, and the 7 old city -- the excavation work that we -- that they 8 do unilaterally and we do not accept, we do not 9 approve of, they do it by force, but by this, they 10 will not get it. Let me tell you. 11 Jerusalem is the most important issue to you 12 guys. It's important, but to us, it's a matter of 13 history. It's a matter of history. No Palestinian 14 state and no peace without Jerusalem. I have said 15 it to all Israelis that I negotiated with. 16 (Speaking in English) I said it to Olmert, the 17 prime minister. 18 (Thereupon, an informal discussion was 19 held off the record.) 20 THE WITNESS: And this is a fact that 21 is not recognized. If it is not 22 recognized, it will be the recipe for 23 violence and terrorism. This was the 24 situation, has only been official to the 25 power of -- through the forces of radical</p>

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<p>1 Confidential - A. Qurei 2 powers, radicalism, extremism, radicalism 3 which extend from Kabul to Casablanca. 4 The Israeli radicalism as well. 5 These are the ones who pushed things in 6 that direction. The direction of more 7 extremism and inability to achieve peace. 8 We are one of those who still believe that 9 there is a possibility for peace, and I am 10 one of those who still believes that it is 11 possible, it is attainable; but to make it 12 happen, that -- that -- there are certain 13 requirements.</p> <p>14 First, you must provide the necessary 15 atmosphere. You must stop all suppressive 16 measurements against Palestinians. Those 17 measurements have been extremely tough and 18 atrocious. I am the son of Abu Dis. Abu 19 Dis is two kilometers away from Jerusalem, 20 from the old city. When I was young, I 21 used to walk to school. Now I have to go 22 around for an hour to get here.</p> <p>23 This is not a normal situation. It 24 is not a healthy situation, I am telling 25 you. I am saying this because this is an</p>	<p>1 Confidential - A. Qurei 2 was the one who handled that mission. I 3 was the prime minister, and I brought them 4 together in all areas, so if good 5 intentions were not there, we will 6 continue in this vicious cycle, and there 7 will be --</p> <p>8 We will be looking for trivial things 9 when the real issue is big and 10 complicated. The factors involved in it 11 when the international and regional 12 ramifications are big. Therefore, I -- I 13 am hopeful -- despite what I have heard in 14 this session, I am hopeful that the -- the 15 spirit of peace will prevail. No future 16 for us and no future for Israel without 17 peace.</p> <p>18 BY MR. STEINER:</p> <p>19 Q. Is the Judaization of Jerusalem a verb? 20 Judaization? Is that a verb that you've created?</p> <p>21 A. No. I do not coin words. This is a term 22 that really describes their -- those practices. 23 Look, the most dangerous thing -- the most dangerous 24 thing that could occur in this case is that the 25 attempt to demolish Al-Aqsa and the attempt to</p>
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<p>1 Confidential - A. Qurei 2 official meeting, official session. 3 Israelis can by force make the 4 situation stay like this for a certain 5 period of time, but it cannot keep it -- 6 keep the situation forever, and we can 7 live under these circumstances for a 8 certain period of time, but we cannot stay 9 and live like this forever.</p> <p>10 Islamic and Arab countries to whom 11 Jerusalem is an important thing can -- can 12 be silent for a certain period of time, 13 but cannot remain silent forever. I am 14 hopeful that the American efforts which 15 are being exerted now will be successful 16 and again accomplish a result. Otherwise, 17 frustration, despair will be the natural 18 outcome.</p> <p>19 The Al Aqsa Intifada had been after 20 the -- after what happened when Sharon 21 came to visit. A group of young people 22 went on a demonstration. They were 23 attacked. There was a reaction, and 24 things developed until we -- in order for 25 us to contain it, it took us years, and I</p>	<p>1 Confidential - A. Qurei 2 change the cultural features and the historical and 3 cultural features of the city unilaterally -- this 4 will destroy everything. This is what I mean by 5 Judaization.</p> <p>6 Q. Sir, you would certainly agree there are 7 Jews who have held property and owned property in 8 Jerusalem for hundreds of years, wouldn't you? 9 (Thereupon, the interpreter then 10 begins to translate the record into Arabic 11 for the witness.)</p> <p>12 MR. ROCHON: Just -- just -- please 13 finish your translation, but I have an 14 objection.</p> <p>15 THE INTERPRETER: I'm done.</p> <p>16 MR. STEINER: You've finished the 17 question?</p> <p>18 THE INTERPRETER: Yes.</p> <p>19 MR. ROCHON: We are not here to 20 debate the politics.</p> <p>21 MR. STEINER: He opened the door.</p> <p>22 MR. ROCHON: No, no. You asked -- 23 you asked a political question, you get 24 the political answer. You asked a 25 question whispered in your ear instead of</p>

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<p>1 Confidential - A. Qurei 2 a question relevant to the case. 3 This is the same thing that happened 4 at the last deposition. We're not here to 5 debate this. You didn't need to ask that 6 question, but if you ask that political 7 question, which has nothing to do with 8 this case, you're going to get this.</p> <p>9 BY MR. STEINER:</p> <p>10 Q. Is there land that was owned by Jews in 11 Jerusalem for hundreds of years?</p> <p>12 A. There are -- there are possibly some 13 properties, because this country has never 14 discriminated on a racial basis. Allow me, please.</p> <p>15 Nobody -- no offense to anyone. There is 16 racial discrimination now. There was nothing 17 before.</p> <p>18 Q. And you don't consider the term 19 "Judaization" racial discrimination?</p> <p>20 A. I'm sorry, no. It was this city has 21 certain -- certain style, vision, Christian, 22 Islamic, Jewish, and tampering with that style is 23 destructive, because they have the power to do it.</p> <p>24 Q. Well, this city is divided into areas 25 which are inhabited by all the people that you just</p>	<p>1 Confidential - A. Qurei 2 MR. McALEER: Counsel, conduct your 3 deposition.</p> <p>4 MR. STEINER: Why are you staring at 5 me?</p> <p>6 MR. McALEER: I'm not staring at you. 7 You are the one asking questions.</p> <p>8 MR. STEINER: He was responding. You 9 are sitting there giving me this nasty 10 look. Is everything all right?</p> <p>11 MR. McALEER: I'm absolutely fine, 12 Counsel.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. Has Judaization occurred in the Armenian 15 quarter?</p> <p>16 (Thereupon, the interpreter then 17 begins to translate the record into Arabic 18 for the witness.)</p> <p>19 MR. ROCHON: Objection. Objection. 20 Just --</p> <p>21 We're not here to have a political, 22 philosophical debate on these very 23 important issues.</p> <p>24 MR. STEINER: Don't give speaking 25 objections. I'm asking the question, and</p>
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<p>1 Confidential - A. Qurei 2 mentioned, correct, Christians, Armenians, Muslims. 3 (Thereupon, the interpreter then 4 begins to translate the record into Arabic 5 for the witness.)</p> <p>6 MR. ROCHON: Objection.</p> <p>7 THE WITNESS: I -- I -- I have a 8 counter -- I have a counterargument. Then 9 we will engage in historical argument.</p> <p>10 BY MR. STEINER:</p> <p>11 Q. If you can, give me a yes or a no 12 response. Does the city have areas which are --</p> <p>13 (Thereupon, the interpreter begins to 14 translate the question into Arabic for the 15 witness.)</p> <p>16 THE INTERPRETER: "Of course. They 17 used to live in the city. They existed -- 18 they never denied their existence, but 19 they deny our existence.</p> <p>20 "The Judaization is a process of land 21 confiscation, and the Israelization is the 22 attempt to expel, evacuate the city of its 23 population."</p> <p>24 MR. STEINER: Why are you staring at 25 me?</p>	<p>1 Confidential - A. Qurei 2 my position is it goes to bias. If you 3 want to direct him not to answer, direct 4 him not to answer.</p> <p>5 MR. ROCHON: He already said he's 6 used the term. You got what you want.</p> <p>7 MR. STEINER: Are you directing him 8 not to answer?</p> <p>9 MR. ROCHON: What? No, I'm not 10 directing him not to answer. I'm asking 11 you not to ask political questions.</p> <p>12 BY MR. STEINER:</p> <p>13 Q. Yes or no?</p> <p>14 Has Judaization occurred in the Armenian 15 quarter? What you described as Judaization?</p> <p>16 A. In the whole city. In the entire city. 17 Please listen to me. Don't listen to that other 18 one. (Speaking in English) Listen to me. When the 19 city was occupied in 1967, its area -- its area was 20 6.7 square kilometers.</p> <p>21 The city now is 72 square kilometers, and the 22 plan that is -- that was prepared by Israel for the 23 year 222 Metropolitan Jerusalem is we make the city 24 440 square kilometers.</p> <p>25 This is a unilateral action from one side</p>

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<p>1 Confidential - A. Qurei 2 against the will of the Palestinians, who are under 3 the occupation.</p> <p>4 MR. ROCHON: Given the time -- 5 MR. STEINER: Right. We are almost 6 done. Sure.</p> <p>7 BY MR. STEINER:</p> <p>8 Q. Sir, while I understand and appreciate 9 your position, I'm sure you would agree that there 10 are those who have different opinions, and there are 11 arguments on the other side as well, correct?</p> <p>12 Without getting into all of that --</p> <p>13 A. We are all supposed to reach -- to 14 respect each other until we reach a solution. 15 I'm -- not to make force the decisive factor.</p> <p>16 (Thereupon, an informal discussion was 17 held off the record.)</p> <p>18 BY MR. STEINER:</p> <p>19 Q. Sir, two or three more questions. Just 20 two or three more questions. Thank you.</p> <p>21 If a Jew builds on land in East Jerusalem that 22 has been owned by Jews for hundreds of years, is 23 that Judaization?</p> <p>24 A. No one confiscates someone else's land if 25 it was in his name, but I do not accept the</p>	<p>1 Confidential - A. Qurei 2 remember that?</p> <p>3 A. Like there are in Jerusalem. 4 Q. Was that Judaization also?</p> <p>5 A. No. Let's not oversimplify it. This is 6 a city under occupation, and it's a -- it's a -- 7 it's an issue subject to negotiations. I -- I am 8 not going to impose anything against them except 9 that what we both agree on, and they should not 10 impose anything on me. In the same fashion, nothing 11 should be imposed against us unless we agree on it. 12 What is going on it is unilateral action.</p> <p>13 One of the important items in the Oslo Accords 14 provides that neither one -- neither one of the two 15 sides has the right to do any act unilaterally 16 that -- which could prejudice the outcome of the 17 permanent state of negotiations. Now, what's 18 happening now is a prejudice, is prejudice, 19 prejudicial, and it's imposition of --</p> <p>20 MS. DAIBAS: De facto situation. 21 THE INTERPRETER: "De facto 22 situation."</p> <p>23 MR. STEINER: Sir, I have no further 24 questions for you. I thank you very much 25 for your time and patience and for coming</p>
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<p>1 Confidential - A. Qurei 2 reasoning that is based on 3,000 years old history. 3 Otherwise, I would say yeah, in the Philippines we 4 will claim Mecca, because it's Muslim.</p> <p>5 Q. Sir, do you remember earlier in this 6 deposition --</p> <p>7 A. Some understanding could be reached. 8 It's possible. It's possible to negotiate the 9 status of the city. How the status will be so that 10 all Jews feel that it is theirs, and Muslims feel it 11 is theirs, and Christians feel it is theirs, that's 12 possible, doable.</p> <p>13 But to come and tell me this is what I want and 14 you can bang your head against the wall, that 15 doesn't work.</p> <p>16 Q. Earlier on in this deposition, there was 17 a point in time when an Israeli attorney entered the 18 room --</p> <p>19 A. Yes.</p> <p>20 Q. -- Avi Har-Zahav, and you asked who he 21 was. Do you remember that?</p> <p>22 A. Yes.</p> <p>23 Q. And then you went on to describe how 24 "There are so many of them. They are outnumbering 25 us. There are always so many of them." Do you</p>	<p>1 Confidential - A. Qurei 2 today. 3 I wish you continued good health with 4 your eye, and I also wish you success in 5 your peace negotiations.</p> <p>6 THE WITNESS: Thank you by (sic) your 7 help.</p> <p>8 MR. ROCHON: Sir, let's take five 9 minutes, and then we will see if we have 10 any questions.</p> <p>11 THE VIDEOGRAPHER: Off the record. 12 The time is 5:08.</p> <p>13 This is the end of Tape No. 5 in the 14 deposition of Ahmed Qurei. 15 (Recess taken at 5:08 p.m.) 16 (Resumed at 5:16 p.m.)</p> <p>17 (Thereupon, a document was marked by 18 the reporter as Plaintiff's Qurei Exhibit 7 19 for identification.)</p> <p>20 THE VIDEOGRAPHER: Back on the 21 record. The time is 5:16. This is Tape 22 No. 6 in the deposition of Ahmed Qurei.</p> <p>23 MR. ROCHON: Thank you. 24 During the break, plaintiff's counsel 25 and I agreed to have a document marked as</p>